## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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**CHAPTER 13** 

In re: LINDA MERRITT,

Debtor

: Bky. Case No. : 11-18134-JFK

Adversary No.: 13-00533

:

LINDA MERRITT

Plaintiff,

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R&R CAPITAL LLC, FTP CAPITAL LLC:

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## MOTION FOR LEAVE TO AMEND THE ADVERSARY COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15 (a)(2) INCORPORATED INTO FEDERAL RULE OF BANKRUPTCY PROCEDURE 7015

Linda Merritt, the Debtor herein, acting Pro Se moves (the "Motion") this Court pursuant to Federal Rule of Civil Procedure 15 (a)(2), incorporated into bankruptcy proceedings by Federal Rule of Bankruptcy Procedure 7015 (the "Bankruptcy Rules") which allows a complaint to be amended with leave of court after a responsive pleading has been filed to amend the Adversary Complaint in this matter and in support thereof, represents that:

- 1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. sections 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. 157 (b)(2)(B) and (K).
- 2. Venue of this proceeding is proper in this district pursuant to 28 U.S.C 1408 and 1403 13 0.338
- 3. On October 20, 2011, Linda Merritt filed a voluntary petition under Chapter 13 in this court.

- 4. On October 20, 2013, Debtor filed the above captioned Adversary Complaint seeking the avoidance of fraudulent transfers of Debtors assets pursuant to 11 U.S.C. 548 and an objection to R&R Capital, LLC proof of claim.
- 5. A copy of the proposed First Amended Complaint is annexed to the Memorandum of Law in Support of this Motion.
- 6. Debtor respectfully requests that the Court grant the Motion.

Date: May 12, 2014

Respectfully submitted:

Linda Merritt, Pro Se